

Hearing Date and Time: June 26, 2007 at 10:00 a.m.  
Response Date and Time: June 19, 2007 at 4:00 p.m.

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Attorneys for Johnson Controls, Inc.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Chapter 11
	:	
Debtors.	:	Case No. 05-44481 (RDD)
	:	
	:	(Jointly Administered)
-----X	:	

**RESPONSE OF JOHNSON CONTROLS, INC. (CLAIM NUMBER 15526)**  
**TO DEBTORS' FIFTEENTH OMNIBUS OBJECTION (SUBSTANTIVE)**  
**PURSUANT TO 11 U.S.C. §502(b) AND FED. R. BANKR. P. 3007 TO CERTAIN**  
**(A) INSUFFICIENTLY DOCUMENTED CLAIMS, (B) CLAIMS NOT REFLECTED**  
**ON DEBTORS' BOOKS AND RECORDS, (C) UNTIMELY CLAIMS AND UNTIMELY**  
**TAX CLAIMS, AND (D) CLAIMS SUBJECT TO MODIFICATION, TAX CLAIMS**  
**SUBJECT TO MODIFICATION, AND MODIFIED CLAIMS ASSERTING**  
**RECLAMATION**

Johnson Controls, Inc., (“JCI”) responds to the objection of Delphi Corporation and its debtor affiliates (collectively, the “Debtors”) concerning claim number 15526 that JCI filed against Delphi Corporation as follows:

1. Claim number 15526 is based upon potential breaches of contract arising under a certain Master Sale and Purchase Agreement and the Environmental Matters Agreement in effect between JCI’s Battery Group and Delphi Corporation. The claim originally included potential claims against Delphi Corporation in connection with a certain lawsuit brought by Worldwide Battery Corporation against both JCI and Delphi Corporation in Madison County, Indiana, but that case has recently settled and it no longer appears that JCI will have a claim against Delphi Corporation arising from that lawsuit.

2. The Debtors have objected to claim number 15526 on the basis that the claim is not supported by their books and records. The Debtors contend that even through JCI’s claim is presumed to be valid, claim number 15526 should be disallowed.

3. JCI filed claim number 15526 as including a contingent and unliquidated component because JCI has potential claims for breach of contract against Delphi Corporation arising under the above-enumerated contracts, copies of which are available upon request. Such breaches would give rise to claims by JCI.

4. JCI reserves the right to amend claim number 15526 to provide the details and damage amount of any such contractual breaches by the Debtors.

5. In the circumstances, the objection to claim number 15526 should be overruled. The person authorized to reconcile and resolve this objection is Stephen T. Bobo, Reed Smith Sachnoff & Weaver, 10 South Wacker Drive, 40<sup>th</sup> Floor, Chicago, Illinois 60606, 312-207-6480.

Dated: June 19, 2007

RESPECTFULLY SUBMITTED

Johnson Controls, Inc.

By: /s/ Elena Lazarou

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